

Control Number: 51415

Item Number: 552

Addendum StartPage: 0





SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO COMMISSION STAFF'S SEVENTEENTH REQUEST FOR INFORMATION

Question Staff No. 17-6:

Please refer to the rebuttal testimony of David A. Hodgson at page 13, lines 1-3 and SWEPCO's Response to Staff's 9th RFI at Staff 9-21, referenced therein, and provide the language used to report the company's perceived risks in the Risk Factors section of the Form 10-K to the Securities and Exchange Commission of AEP Inc. and SWEPCO for the fiscal year ending December 31, 2020. If such perceived risk was not reported, provide a detailed explanation and justification for why it was not reported, including whether the risk associated with a potential normalization violation is perceived to be lower or higher than the risk factors actually reported.

Response Staff No. 17-6:

The regulatory operational risk that is identified by Company witness Hodgson is part of the overall regulatory risk that is reported on page 34 of the AEP Inc, 2020 Form 10-K under the heading "Regulated electric revenues and earnings are dependent on federal and state regulation that may limit AEP's ability to recover costs and other amounts." Under this heading is the following sentence:

AEP cannot predict the ultimate outcomes of any settlements or the actions by the FERC or the respective state commissions in establishing rates.

Title: Tax Acctg & Reg Support Mgr Prepared By: David A. Hodgson

Sponsored By: David A. Hodgson Title: Tax Acctg & Reg Support Mgr